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U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

DEC 08 2010

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK
LAWRENCE K. BAERMAN, CLERK
ALBANY

UNITED STATES OF AMERICA

v.

IANI S. TASSEV,

Defendants.

INDICTMENT

Crim. No. 10-CR-583 (GLS)

Vio: 21 U.S.C §§ 846, 841(a)(1)

(Felony Count)

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Possess With Intent To Distribute and Distribute Marijuana

Between on or about November of 2008 and November of 2010, in the State and Northern District of New York and elsewhere, the defendant,

IANI S. TASSEV,

knowingly and intentionally combined, conspired, confederated and agreed with other persons to possess with intent to distribute and to distribute a controlled substance, which offense involved a mixture and substance containing more than 100 kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846, and subject to the penalty provisions of Title 21, United States Code, Section 841(b)(1)(B).

FORFEITURE ALLEGATION

Counts One of this indictment is realleged and incorporated by reference as though fully set forth herein.

As a result of committing the controlled substance offense alleged in Count One of this Indictment, which is realleged and incorporated by reference as if fully set forth herein, defendant **IANI S. TASSEV** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, his interest in any and all property constituting, or derived from, any proceeds that said defendant obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Count One of this indictment, and

The intent of the United States of America to forfeit such property includes and is not limited to the following property:

A. MONEY JUDGMENT

A money judgment reflecting the full value of the proceeds obtained from the Title 21 conspiracy alleged in Count One.

SUBSTITUTE ASSETS

If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

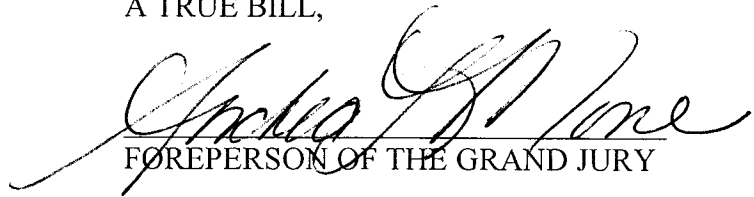
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

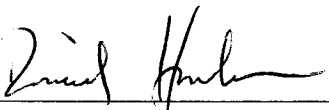
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the forfeiture judgment.

A TRUE BILL,

Dated: December 08, 2010


FOREPERSON OF THE GRAND JURY

RICHARD S. HARTUNIAN
UNITED STATES ATTORNEY

By: 
Daniel Hanlon
Assistant United States Attorney
Bar Roll # 514103